



**Michael J. Willemin**  
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March 17, 2025

**VIA ECF**

The Honorable Ronnie Abrams  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Eckhart v. Fox News Network, LLC, et al.; Case No. 20-cv-5593 (RA)(GWG)

Dear Judge Abrams,

We represent Plaintiff in this action against Defendant Ed Henry. We write on behalf of both parties to seek an adjournment of the trial currently set for May 12, 2025. We respectfully request that the trial be scheduled to begin in the first half of June 2025 if that time is convenient to the Court.

This request is made for two primary reasons. First, counsel for both parties have scheduling conflicts. Plaintiff's counsel is scheduled to be away during periods of time that would involve significant pretrial filings and work, and defense counsel has an arbitration that is already scheduled for the week of May 12, 2025. Second, it is Plaintiff's position that expert discovery never closed and explicitly continued to run concurrent with the summary judgment filings to provide the parties with an opportunity to obtain all relevant medical records consistent with a prior order of this Court (and to serve expert disclosures and reports subsequent to the acquisition of those records). As such, Plaintiff intends to prepare and submit expert disclosures before trial. For his part, Defendant may take the position that expert discovery is closed and object to any disclosures. Either way, the requested adjournment will give the parties time to meet and confer on this issue and, if appropriate, complete any outstanding expert discovery prior to trial.

We thank Your Honor for the Court's time and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. J. Willemin', is written over the typed name.

Michael J. Willemin